

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

EILEEN LANAHAN, ) Case No.: 2:06-cv-1176-LRH-RJJ

VS.

**STIPULATION AND ORDER**  
**FOR EXTENSION FOR**  
**DEFENDANT TO FILE REPLY TO**  
**PLAINTIFF'S OPPOSITION TO**  
**MOTION FOR SUMMARY**

**(Second Request)**

- 1 -

1 The granting of Plaintiff's requests for extensions pushed the Reply deadline to  
 2 a time when Defendant's counsel has been involved in extensive collective bargaining  
 3 negotiations, arbitration hearings, and other events on behalf of other clients and,  
 4 therefore, he has been unable to complete the Reply to Plaintiff's Opposition.  
 5 Therefore, on September 2, 2008, Defendant requested a one-week extension of time to  
 6 file its Reply. Since then, though Defendant's counsel has been working diligently on  
 7 finalizing the Reply, additional responsibilities, including a teacher termination  
 8 hearing, has made it difficult to complete the document as anticipated. Additionally,  
 9 the time is necessary so as to allow the District appropriate time to review the Reply  
 10 prior to filing.

11 This is Defendant's second request for an extension in this matter and is made  
 12 in good faith and not for any reason of delay. Indeed, the time sought is only five days,  
 13 and the District will be seeking no further extensions of this deadline.

14 Therefore, it is request that the Court grant Defendant up to and including  
 15 September 15, 2008, within which to file its Reply to Plaintiff's Opposition.

16 DATED this 10<sup>th</sup> day of September, 2008, DATED this 10<sup>th</sup> day of September,  
 17 2008.

18 FISHER & PHILLIPS LLP

19 /s/ Richard Segerblom  
 20 RICHARD SEGERBLOM, ESQ.  
 21 Nevada Bar No.: 1010  
 22 704 South Ninth Street  
 Las Vegas, NV 89101  
 Attorney for Plaintiff

By /s/ Shaun P. Haley  
 Shaun P. Haley, Esq.  
 Nevada Bar No.: 7000  
 3993 Howard Hughes Parkway,  
 Suite. 650  
 Las Vegas, Nevada 89169  
 Attorneys for Defendant

23  
 24 IT IS SO ORDERED this 11th day of September, 2008.

25  
 26  
 27  
 28



LARRY R. HICKS  
 UNITED STATES DISTRICT JUDGE